

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ERIC MICHAEL ROSEMAN, et al.,
individually and on behalf of others similarly
situated,

Plaintiffs,

v.

BLOOMBERG L.P.,

Defendant.

Case No. 14 CV 2657 (DLC)

NOTICE OF JOINT MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT

For the reasons set forth in the Parties' Memorandum of Law in Support of the Joint Motion for Final Approval of Class Settlement and the Declaration of Dan Getman and supporting documents, the Parties respectfully request that the Court grant final approval of the Settlement Agreement, including:

- (i) a ruling that the Agreement is final, fair, reasonable, adequate, and binding on all Qualified Class Members (as such term is defined in the Settlement Agreement, attached as Exhibit 1 to the Declaration of Dan Getman in support of this motion ("Getman Decl."));
- (ii) entry of the Final Approval Order and entry of Final Judgment attached hereto;
- (iii) dismissal of this case with prejudice, subject to the Court's retention of jurisdiction to oversee enforcement of the Settlement Agreement;
- (iv) an order that Defendant transfer all funds due herein to the Qualified Settlement Fund in the timeframe specified by the Settlement Agreement;

- (v) an order that the Settlement Administrator should distribute Settlement Checks from the Qualified Settlement Fund per the Settlement Agreement timing requirements; and
- (vi) an order that the amount of any Settlement Checks that remain uncashed at the end of the payout period described herein (or after the date until which any subsequent or replacement checks remain payable, whichever is later) and that are not used to fund the Errors and Omissions Fund agreed upon in the Settlement Agreement will be paid equally to the Cy Pres Recipients described herein.

The Parties have attached a Proposed Order and a Proposed Final Judgment hereto.

Dated: October 5, 2018

Respectfully Submitted,

/s/ Dan Getman
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